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and

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*Special Litigation Counsel for Alfred H. Siegel,
Liquidating Trustee*

*Counsel for Trustee of the Circuit City Stores, Inc.
Liquidating Trust*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <u>et al.</u> ,	:	Case No. 08-35653 (KRH)
	:	
Debtors.	:	
	:	Jointly Administered

**MOTION FOR ADMISSION
PRO HAC VICE OF ERIC WINSTON**

Lynn L. Tavenner and Paula S. Beran (“Movants”) hereby move the Court, pursuant to Local Bankruptcy Rule 2009-1(E), to enter an order authorizing Eric Winston (“Mr. Winston”), an attorney with the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, to appear pro hac vice in the referenced proceeding before the United States Bankruptcy Court for the Eastern District of Virginia (the “Bankruptcy Court”) to represent the Circuit City Stores, Inc. Liquidating Trust, and in support of this Motion, the Movants state as follows:

1. Movants are members in good standing of the Bar of the Commonwealth of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.

2. Mr. Winston is a member of good standing of the State Bar of California and is an attorney admitted to practice before the United States Court of Appeals for the Second Circuit, Third Circuit, Ninth Circuit, and Tenth Circuit, and the United States District Court for the Northern, Southern, Eastern and Central Districts of California. There are no disciplinary proceedings pending against Mr. Winston in any jurisdiction in which he is admitted to practice.

3. Movant requests that this Court authorize Mr. Winston to file pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in the Bankruptcy Case (and related adversary proceedings) on behalf of the Circuit City Stores, Inc. Liquidating Trust.

4. Movant and her law firm shall serve as co-counsel with Mr. Winston in the Bankruptcy Case (and related adversary proceedings).

5. Notice of this Motion has been given to (a) the Office of the United States Trustee, (b) counsel for the Debtor, and (c) all persons receiving electronic notice in the Bankruptcy Case as of the service hereof.

6. The Application to Qualify as a Foreign Attorney Under Local Bankruptcy Rules 2090-1(E) is attached hereto as Exhibit A.

WHEREFORE, Movant respectfully requests that this Court enter an Order authorizing Eric Winston to appear pro hac vice in the Bankruptcy Case in substantially the same form as Exhibit B attached hereto and grant such other and further relief as just.

Dated: February 25, 2016

Respectfully submitted,

/s/ Paula S. Beran

Movant

Lynn L. Tavenner (VA Bar No. 30083)
Paula S. Beran (VA Bar No. 34679)
TAVENNER & BERAN PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
Telephone: 804-783-8300
Telecopy: 804-783-0178

Co-Counsel for the Circuit City Stores, Inc. Liquidating Trust

CERTIFICATION OF SERVICE

I hereby certify that on February 25, 2016, a true and correct copy of the foregoing Motion for Admission Pro Hac Vice of Eric Winston was served on all persons receiving electronic notice in these cases, including:

Assistant United States Trustee
Robert B. Van Arsdale
Office of the United States Trustee
701 East Broad Street, Suite 4303
Richmond, VA 23219

/s/ Paula S. Beran
Movant

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER
LOCAL BANKRUPTCY RULE 2090-1(E)(2)

In Case No.: 08-35653-KRH, * Case Name Circuit City Stores, Inc., et. al.

PERSONAL STATEMENT

FULL NAME (no initials, please) Eric Winston
Bar Identification Number 202407 State California
Firm Name Quinn Emanuel Urquhart & Sullivan, LLP
Firm Phone # 1-213-443-3000 Direct Dial # 213-443-3602 FAX # 1-213-443-3100
E-Mail Address ericwinston@quinnemanuel.com
Office Mailing Address 865 S. Figueroa Street, 10th Floor, Los Angeles, CA 90017
Name(s) of federal court(s) in which I have been admitted U.S. Court of Appeals for the Second, Third, Ninth, and Tenth Circuits
U.S. District Court for the Northern, Southern, Eastern and Central Districts of California
I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.


(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.


(Signature)

February 25, 2016

(Date)

Paula S. Beran, Esq.

(Typed or Printed Name)

**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.

Exhibit B

Jeffrey N. Pomerantz, Esq.
Andrew W. Caine, Esq.
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-and-

*Counsel to the Circuit City Stores, Inc.
Liquidating Trust*

Robert J. Feinstein, Esq.
John A. Morris, Esq.
Beth E. Levine, Esq.
(admitted *pro hac vice*)
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Telecopy: (212) 561-7777

*Counsel to the Circuit City Stores, Inc.
Liquidating Trust*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <u>et al.</u> ,	:	Case No. 08-35653 (KRH)
	:	
Debtors.	:	
	:	Jointly Administered

**ORDER GRANTING MOTION FOR ADMISSION
PRO HAC VICE OF ERIC WINSTON**

The matter came before the Court upon the Motion for Admission Pro Hac Vice of Eric Winston (the “Motion”) filed by Lynn L. Tavenner and Paula S. Beran, seeking admission pro hac vice for Eric Winston, of the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, in the

above-referenced bankruptcy case (the “Bankruptcy Case”) pursuant to Local Bankruptcy Rule 2090-1(E). After review of the Motion and statements therein, the Court finds that adequate notice of the Motion has been provided, no other or further notice is necessary or required, and it is appropriate that Eric Winston be authorized to practice pro hac vice before the Court in this Bankruptcy Case and any related adversary proceedings, it is hereby

ORDERED as follows:

1. The Motion is hereby Granted.
2. Eric Winston, of the law firm of Quinn Emanuel Urquhart & Sullivan, LLP is hereby admitted to appear in this Bankruptcy Case and any related adversary proceedings pro hac vice pursuant to Local Bankruptcy Rule 2090-1(E)(2) on behalf of the Circuit City Stores, Inc. Liquidating Trust.

Dated:

UNITED STATES BANKRUPTCY JUDGE

I ASK FOR THIS:

/s/ Paula S. Beran

Lynn L. Tavenner (VA Bar No. 30083)
Paula S. Beran (VA Bar No. 34679)
TAVENNER & BERAN PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
Telephone: 804-783-8300
Facsimile: 804-783-0178

Co-Counsel for the Circuit City Stores, Inc. Liquidating Trust

RULE 9022-1 CERTIFICATION

I HEREBY CERTIFY that the foregoing proposed order has been endorsed by all
necessary parties.

/s/ Paula S. Beran

*Co-Counsel for the Circuit City Stores, Inc.
Liquidating Trust*